

1 was Stevick.

2 Q Stevick, S-t-e-v-i-c-k?

US EPA RECORDS CENTER REGION 5



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3 Do you think his name was Gordon?

4 Does that -- do you recall that?

5 A I don't know.

6 Q Do you recall any of the workers at the landfill?

7 A There was another one there, but I don't know who he  
8 was. I don't know his name or anything.

9 Q So you would drive up on Erie Road to the landfill --

10 A Right.

11 Q -- and you would come with your dump truck; and then,  
12 what would be your next --

13 A He'd tell you where to dump, and you'd go dump it.

14 Q So was it the same man every day that would tell you  
15 where to dump?

16 A Yes.

17 Q And do you recall, would you dump it out, or would you  
18 place the barrels onto the --

19 A Just raise the box and dump.

20 Q And the drums would just fall?

21 A Yes, fall.

22 Q So you would see some of the materials spill out?

23 A Right.

24 Q And do you know, when you'd come back, say, the next  
25 day, were the barrels covered over?

1 A Yes.

2 Q And what kind of cover was on the barrels; do you  
3 recall?

4 A What kind of cover?

5 Q Was it dirt?

6 A What kind of cover could it be?

7 Q It could be any number of items. I want you to tell me.

8 A Dirt.

9 Q Just dirt? It didn't have any -- it wasn't like  
10 murky tar, or --

11 A No.

12 Q So it was just plain old dirt?

13 A Right.

14 Q Okay.

15 I have a couple pictures here that  
16 we'll submit as exhibits. One is from 1967, and this is  
17 an aerial photo of the landfill, of the dump; and this  
18 -- here's the original. This might help you see.

19 Now, can you recall from this photo  
20 -- does this help you point out where you might have  
21 deposited the drums at?

22 A Anyplace.

23 Q Anyplace? Do you know, on this picture, where Erie Road  
24 is?

25 A No.

1 Q No?

2 A Is that it there? (Indicating)

3 Q So if you knew the road at the bottom of the photo, it  
4 curves, to be Erie Road, do you know then where you  
5 might have dumped the drums, or where you pulled your  
6 truck in?

7 A Just drive in here, back up and dump them.

8 Q So it would depend on the day, perhaps, where you might  
9 dump the drums?

10 A I might dump them in this corner, or I might dump them  
11 over in the other corner.

12 Q So it -- you would just depend on the operator's  
13 directions?

14 A Yes. Wherever he told me to dump, that's where we  
15 dumped.

16 Q But you never dumped out the drums manually --

17 A No.

18 Q -- you just let them spill out of the truck?

19 A Yes.

20 Q During your fifteen years working for Whitey Hall, for  
21 Blyveis, do you recall how many drums you might have  
22 taken?

23 A No.

24 Q Would you say hundreds or thousands? I don't expect you  
25 to know exactly, but --

- 1 Q On State Street.
- 2 A When that one closed up, we went to Erie Street.
- 3 Q Do you know why it closed up?
- 4 A Filled up.
- 5 Q Filled up.
- 6 A It's a nice park now.
- 7 Q So would you say late '60s, maybe, that you started?
- 8 A Probably.
- 9 Q But can you say for sure?
- 10 A No, I can't say for sure. I'm not saying nothing for
- 11 sure on dates.
- 12 Q That's okay. I just want to try and -- if you can
- 13 approximate maybe any significant events in your life
- 14 that you can think about that might have been around
- 15 that time that you started hauling to the dump on Erie?
- 16 A No. All I can tell you is that when one closed up, I
- 17 went to the other one.
- 18 Q So could you say maybe that you hauled to the landfill
- 19 on Erie Road for ten years, or --
- 20 A Probably. Might be ten years, might be eight years.
- 21 Q Do you think it was -- it was at least one year; right?
- 22 A It was one year, maybe two years anyway.
- 23 Q So you know it was at least two years?
- 24 A Yeah.
- 25 Q Do you think it could have been at least five years?

1 A You hauled every day.

2 Q Every day. So it didn't matter how cold, how frozen?

3 When the ground was frozen, do you  
4 know how -- they just dumped off the drums, same as  
5 every other day?

6 A Dump them off and then go.

7 Q Okay. When you started now at the State Street dump  
8 --

9 A Right.

10 Q -- and then that filled up?

11 A Right.

12 Q And then you went to -- what is the -- oh, I'm sorry.

13 What is the park's name on the State  
14 Street dump now; do you recall? Is it a city park?

15 A They had a basketball court there and they tore that up  
16 a while ago. Now, it's just open land.

17 Q It's open land?

18 A They keep it cut, the grass cut.

19 Q Do you know at what street it's at?

20 A State Street.

21 Q State Street and another street?

22 A I don't know. One goes this way and one goes that way.  
23 It sets in the middle.

24 Q So it's a "Y"?

25 A Yes.

1 dumping.

2 Q Okay. Did you see him with great frequency, if you  
3 would be out there?

4 A They just dumped like I did.

5 Q So about the --

6 A Once a day, maybe three times a day they'd dump.

7 It's -- they dumped stuff from each  
8 department. What they'd do, they'd go around to each  
9 department, pick up the trash.

10 Q What kind of departments did they have there; do you  
11 know?

12 A They made glass tubes is all I can tell you.

13 Q And you knew that from living in this area, that they  
14 made glass tubes?

15 A Uh-huh.

16 Q Were they broken tubes?

17 A Broken glass, cardboard that wasn't any good.

18 Q And they dumped in the same pit that you dumped?

19 A Right.

20 Q How about some of the household waste, the area  
21 residents; where did --

22 A You'd see tin cans and stuff like that in there.

23 Q And they dumped in the same pit?

24 A In that same place.

25 Q They didn't have a separate --

- 1 A They didn't have a separate place, no.
- 2 Q No? And the owner or the operator of the dump never
- 3 told them to dump in a separate place?
- 4 A He told you where to dump when you went in.
- 5 Q Okay.
- 6 A He's stick his head out the door and tell you where to
- 7 dump; there, there, there.
- 8 Q Okay. But he didn't distinguish between, say, you
- 9 bringing your garbage from home, like trash, household
- 10 trash --
- 11 A No, not at all.
- 12 Q -- from the barrels?
- 13 A If I backed up and dumped, pulled out, somebody else
- 14 would back in there with household trash right on top of
- 15 me.
- 16 Q Okay. So you had mixed in with your paint drums -- not
- 17 your paint drums, but the paint drums that you were
- 18 hauling --
- 19 A They were on my truck.
- 20 Q Did you ever see any sort of sludges or paste, some
- 21 thick gooey substance, other than the paint?
- 22 A No.
- 23 Q So you never saw any sort of toothpaste-like sludge or
- 24 greenish color?
- 25 A No. You get off, open the gate, back up and dump it,

1. material?

2 A. I don't know. What you did is you backed up to a big  
3 hole and dumped your stuff in it and they had  
4 bulldozers there covering it.

5 Q. Did you ever meet the owner of the landfill?

6 A. What was his name, Sivic, Zivic?

7 Q. Stevick?

8 A. Yeah, I've seen him.

9 Q. Did you ever talk to him?

10 A. Maybe for five minutes. I had an argument with him one  
11 day.

12 Q. And was he out at the landfill?

13 A. He was out at the landfill.

14 Q. Do you know whether he spent a lot of time out there?

15 A. I presume he did.

16 Q. Do you know any other employee's names that worked at  
17 the landfill?

18 A. No, there was an old gentleman that was around town for  
19 a long time that used to work there, but I don't know  
20 what his name was, and I haven't seen him in the last  
21 four or five years.

22 Q. Do you know an individual by the name of Lloyd Mosher?

23 A. No.

24 Q. Do you know the employee's names of any of the  
25 companies that you or the industries that you listed

1 Did they give you a copy of what you signed?

2 A. No.

3 Q. They did not. Okay.

4 I'm going to ask you a few questions about your  
5 work at the landfill, when you worked for Mr. Stevick.  
6 When did you start working for Mr. Stevick at the  
7 landfill?

8 A. Well, when he started the dump up.

9 Q. Was that around 1968 or 69?

10 A. Somewhere in there. I was the one that started the  
11 dump.

12 Q. When you began working at the landfill, what was your  
13 job? What was your responsibility?

14 A. Tell them where to dump, and dig a hole for them to  
15 dump in, and then cover it up at night, after we got  
16 through -- after the dump closed at night, why, then it  
17 was covered it.

18 Q. Was Mr. Stevick on the grounds whenever you directed  
19 the customers?

20 A. Very seldom. Maybe he would come 2 or 3 times a week,  
21 and he wouldn't stay over an hour at the most.

22 Q. But, he was your supervisor? He gave you instructions?

23 A. Yes.

24 Q. Did you have any other supervisors?

25 A. No.

1 Q. And, Mr. Stevick's full name is?

2 A. Gordon.

3 Q. Gordon Stevick.

4 Did you ever supervise anyone? Did you have  
5 anyone working under you, that you directed what to do?

6 A. Well, not really. At one time there was Stevick's  
7 grandkids worked there, and they worked after I went  
8 home.

9 Q. Would that be Perry Stevick, do you remember?

10 A. Yeah, that was one of them.

11 Q. And, there was another grandchild that worked there?

12 A. Yes.

13 Q. Do you remember his name?

14 A. No, I don't.

15 Q. Do you know whose child that was?

16 A. I think it was Perry's brother.

17 Q. It was Perry's brother?

18 A. I believe.

19 Q. Okay -- did you --

20 A. I didn't pay too much attention to it.

21 Q. So, those were the only other coworkers you had, or did  
22 you have some other coworkers?

23 A. No -- well, I say no. Jerry hunt worked there. But, I  
24 didn't have anything to do with him.

25 Q. What did Jerry hunt do at the landfill?

1 S T A T E M E N T  
2 O F  
3 DONALD HULL  
4

COPY

5 IN RE: In the Matter of the Albion-Sheridan Township  
6 Landfill Site

7 BY: MR. KURT N. LINDLAND  
8 77 West Jackson Blvd.  
Chicago, Illinois 60604, appearing on behalf  
of the U.S. Environmental Protection Agency.

9 MR. CHARLES E. BARBIERI  
10 313 South Washington  
Lansing, Michigan 48933, appearing on behalf  
11 of the Deponent, Donald Hull.

12 REPORTED BY: ACRO COURT REPORTERS, INC.  
13 (Toni L. VanSyckle, Reporter)

14 At Albion City Hall, 112 Case Street, Albion  
15 Michigan, on Thursday, June 4, 1992 commencing at or about  
16 the hour of 2:05 p.m.  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 Q. It was Hayes-Albion at that time?

2 A. Yes.

3 Q. I see. Did Hayes-Albion contract with someone else  
4 then, do you know?

5 A. Yes.

6 Q. Do you remember what the name of the company was?

7 A. No, I don't. I know they were from Jackson.

8 Q. What were your responsibilities while you were at the  
9 City of Albion?

10 A. I was superintendent of streets.

11 Q. And briefly could you describe those responsibilities?

12 A. Keep the streets clean of debris and repair asphalt,  
13 taking care of the tree dump where they take the tree  
14 limbs and things and burning that off periodically,  
15 maintenance of the trucks within the city. That covers  
16 about most of the time.

17 Q. Were you responsible for contracting with Gordon  
18 Stevick in any way for the use of his landfill?

19 A. No.

20 Q. Were your responsibilities while you were working for  
21 the city in any way related to waste disposal?

22 A. Yes.

23 Q. And how were those responsibilities related to waste  
24 disposal?

25 A. Terminology of waste disposal the city has a spring

1 truck and take them down to the railroad site.

2 Q. Did you pick up any other material there?

3 A. No.

4 Q. When contracts were made between Blyveis and some of  
5 these, we'll call them clients or customers, who wrote  
6 the contracts.

7 A. Per se I guess it was just be a purchase order; like we  
8 were allowed to move scrap out of the premises for the  
9 month and that type of thing.

10 Q. So it was more an oral agreement?

11 A. Yes.

12 Q. Okay. What about the accounting on behalf of Blyveis,  
13 who was responsible for that part of the business, was  
14 that you?

15 A. Yes.

16 Q. Okay. You mention earlier that you recall having a  
17 discussion with Paul Rogers of EPA's office. Do you  
18 remember that discussion?

19 A. Yes.

20 Q. During that discussion, you had mentioned that there  
21 were some drums of paint material that came --

22 A. One moment now. I was brought down here on the premise  
23 of city work, okay. City folks left and Paul asked  
24 me -- asked me a few questions about McGraw and Stevick  
25 landfill. So unbeknowns to me that this was what was

1 transpiring. I was not here on my own free will and  
2 accord to relay any information to Paul. At that time,  
3 he asked me in a genuine way, and I responded in a  
4 genuine way and that's how the premise of the landfill  
5 and McGraw got tied in.

6 Q. Okay.

7 A. Then after that transpired, he wanted some more  
8 information and I said to Paul, "I gave you that stuff  
9 there". It must have been probably about 45 minutes to  
10 an hour, whatever he was writing down. I said, "I gave  
11 you that, everything of my heart right there, it should  
12 all be there". And he said it would be recorded, he  
13 said that wasn't good enough. I said, well, I don't  
14 know.

15 So then he mentioned about the court stenographer  
16 and I said, "that information I gave you, they won't  
17 accept it, my goodness" and in his handwriting and  
18 everything else.

19 MR. LINDLAND: Right. If we can go off the record  
20 for a minute.

21 (Off-the-record discussion)

22 Q. (BY MR. LINDLAND) For the record, when you spoke with  
23 Paul Rogers of our office, you mentioned some drums  
24 with some paint material in them that came from McGraw  
25 Edison. Were those drums open?

1 Q. Okay. And did you just leave the drums out there at  
2 the landfill?

3 A. Yes, the dump trucks take them out and dump them in an  
4 area and that would be it.

5 Q. And that's at the Stevick landfill or the  
6 Albion-Sheridan Landfill, correct?

7 A. Yes.

8 Q. What kind of material exactly was in the drums, do you  
9 know?

10 A. Could have been slurry, it could have been just some  
11 color clouded material, liquid; could be half full.

12 Q. Okay. When you say a slurry, what do you mean by  
13 slurry?

14 A. Probably water and just a little bit of mud, enough so  
15 it wouldn't be a liquid.

16 Q. Okay, something thicker than a liquid but thinner than  
17 a solid?

18 A. Yes.

19 Q. A new phase.

20 And what color was this stuff usually?

21 A. Cloudy, clear; the paint itself would be whatever,  
22 brownish.

23 Q. Do you remember whether it was any other colors: bright  
24 blues, or greens, or anything?

25 A. No. Probably a gray if anything.

1 Q. Do you remember whether this material had any vapors to  
2 it or smelled in any way?

3 A. No, nothing -- no.

4 Q. Nothing that you remember?

5 A. Yes.

6 Q. Were the drums in pretty good condition?

7 A. Mostly, yes.

8 Q. And most of them had lids or did not have lids?

9 A. They had the top part still on them. In other words,  
10 they were not -- wouldn't take the tops off, just cut  
11 around and do what they wanted, put material in there  
12 and be a little of everything and floor sweepings, some  
13 band iron, this type of thing.

14 Q. Do you remember whether the drums had any lettering on  
15 them or numbers?

16 A. I'm thinking there are some numbers, some letters,  
17 yeah.

18 Q. Do you remember what color those were painted on?

19 A. No.

20 Q. Or stencilled or whatever?

21 A. There was some from Cleveland, I know that.

22 Q. Some of the drums were from Cleveland?

23 A. Yeah.

24 Q. Do you remember what they said on them, were there  
25 names on the side?

1 A. No.

2 Q. Again, referring to your interview with Paul Rogers,  
3 you mentioned that you had asked McGraw Edison whether  
4 the material would burn your skin, do you remember  
5 that?

6 A. Yes.

7 Q. Do you remember what led you to ask them whether the  
8 material would burn your skin?

9 A. I don't understand the question.

10 Q. Why did you ask McGraw Edison that?

11 A. Well, safety reasons as far as personnel.

12 Q. Was there something about the material itself that led  
13 you to believe that it might burn your skin?

14 A. No, no, just paint, I guess, probably only standoffish  
15 thing.

16 Q. Just knowing that it was paint?

17 A. Yeah.

18 Q. Okay. You mentioned that in some cases the paint was  
19 solid, is that correct, or was it always a liquid?

20 A. Sort of a liquid, yes.

21 Q. Was there -- did you ever notice a sludge material on  
22 the bottom of the drums as opposed to a separate liquid  
23 layer?

24 A. No.

25 Q. Do you know if whether these drums had been stored or

1        were sitting, you know, standing still at the facility  
2        for a number of months or was this material --

3        A.    You mean Stevick's landfill?

4        Q.    No, at McGraw Edison.

5        A.    No, it seemed like they bring them out and we would see  
6        they had seven or eight and take them away.

7        Q.    Okay. Do you remember whether there was any other  
8        material in the drums other than paint?

9        A.    Well, I say there was floor sweepings, band iron, some  
10       other miscellaneous styrofoam things that may be from  
11       packing.

12       Q.    Okay. So more general refuse kind of thing?

13       A.    Yeah.

14       Q.    Do you remember whether there was any other liquid  
15       material in the drums, for example, used oil or grease  
16       cleaners of any kind?

17       A.    No, no.

18       Q.    When you brought the drums out to -- or from McGraw  
19       Edison out to the landfill, did you stop at any point  
20       in between?

21       A.    No.

22       Q.    Usually when you brought material out to Stevick's  
23       landfill, did you talk to anybody at the landfill as to  
24       where the materials should be placed?

25       A.    Yes, there would be someone to direct them where to put

1 the barrels at.

2 Q. And where would they normally direct you to put the  
3 barrels?

4 A. The site changed so much over time.

5 Q. Okay. Approximately how many years did you pick up  
6 material at McGraw Edison and take it to the  
7 Albion-Sheridan Landfill?

8 A. Probably 12, 15 years.

9 Q. And were your pickups fairly consistent throughout that  
10 time or was there a period when you would bring that  
11 material to another landfill?

12 A. No, to my recollection, Stevick was the place we took  
13 them to.

14 Q. Okay, so on the average, you picked up seven or eight  
15 drums a week for 12 to 15 years and brought those  
16 drums --

17 A. Not every week, maybe in there.

18 Q. Every other week?

19 A. Yes.

20 Q. And you brought that material then to the  
21 Albion-Sheridan Township Landfill?

22 A. Right.

23 Q. You mentioned that the location where you would place  
24 the drums when you got the landfill changed over time.  
25 Beginning with the, say, the first three or five years

1 when you brought drums out from McGraw Edison, where  
2 would you place those drums, do you remember?

3 A. Seems like they had a roadway in there, a gate and just  
4 went in there and placed them in the landfill area.

5 Q. Was it dug like a pit or was it just on the surface?

6 A. Somewhere it might be a pit, yes.

7 Q. Do you know whether drums were buried out there?

8 A. I don't know.

9 Q. When you would go out there, would you see the drums  
10 that you brought the week before out there?

11 A. I don't know.

12 Q. Do you ever remember driving down the driveway that  
13 goes into the landfill, the dummy area, and as you were  
14 driving in to drop off the drums do you remember seeing  
15 any drums already there?

16 A. No.

17 Q. Do you know whether there were any other companies that  
18 used that landfill for disposing of their waste?

19 A. The City of Albion and the two townships, they had  
20 industries that delivered material out there.

21 Q. Were the containers ever returned from McGraw Edison,  
22 in other words, did you ever bring material, paint,  
23 waste from McGraw Edison out to the landfill, dump the  
24 material and bring the drums back?

25 A. No.

1 Q. You always left the drums out there?

2 A. Yes.

3 Q. Do you ever remember seeing a liquid pond or disposal  
4 area out at the landfill?

5 A. No.

6 Q. Did Blyveis ever pick up drums from anybody else, any  
7 other industries in town?

8 A. No.

9 Q. Did Blyveis ever pick up any drums from anywhere and  
10 bring them out to the landfill other than McGraw  
11 Edison?

12 A. Once in awhile somebody would have a few surplus of  
13 barrels with the tops on them and we would purchase  
14 them to put our scrap copper, or aluminum, brass,  
15 copper in these drums; but they were clean drums, they  
16 had to be clean drums so buy that one and cut the heads  
17 out.

18 Q. So you would buy empty drums, cut the heads off and  
19 fill them with your scrap material?

20 A. Yep.

21 Q. And what would you do with the drums then?

22 A. We would place scrap copper, copper wire, brass  
23 fittings from the plumbers, lead from the plumbers and  
24 various other aluminum from the households, the dinner  
25 plates aluminum.

1 Q. And you put those in the drums?

2 A. Yes.

3 Q. And then what would you do with the drums then?

4 A. We would take them in the Detroit area and sell the  
5 material and bring them back at least 12, 14 drums so  
6 we could keep on using them.

7 Q. Did you ever bring those drums out to the landfill?

8 A. No.

9 Q. You mention that there was some other industries that  
10 used the landfill.

11 Do you know specifically whether any industries  
12 brought materials in drums, 55 gallon drums?

13 A. No, I don't.

14 Q. What industries do you remember seeing using the  
15 landfill?

16 A. Union Steel, Corning Glass Works.

17 Q. Do you know what kind of material those two companies  
18 brought out there?

19 A. No.

20 Q. Do you know of anybody that would know what kind of  
21 material they brought there?

22 A. No, I don't.

23 Q. You mentioned that you would pick up batteries from  
24 companies in town, gas stations, service stations?

25 A. Yes.

1           that worked at Albion Malable?

2    A.    No.

3    Q.    Approximately how much sand did you haul from Albion  
4           Malable to the landfill?

5    A.    We did not haul Malable sand to the Stevick landfill.

6    Q.    Where did you haul it to?

7    A.    A man named -- West Michigan Avenue.  Nate Copick,  
8           C-O-P-I-C-K, I think, Copick.

9    Q.    Did you ever haul any sand at all from Albion Malable  
10           to the Stevick landfill?

11   A.    No.

12   Q.    Did you haul anything from Albion Malable to the  
13           Stevick landfill?

14   A.    Yes.

15   Q.    And what was that?

16   A.    After they shut down, our little incinerator for the  
17           office papers, all this stuff, they had to put it in a  
18           special bin and we had -- not a special truck but a  
19           special truck to put these papers in there, and cover  
20           them up, and take them out to Stevick's landfill, that  
21           was the only -- there was some wooden pallets,  
22           expendable pallets, wooden pallets.

23   Q.    You're referring to the wood pallets that have boards  
24           on top that you normally put -- so you can move them  
25           around with a forklift?

- 1 A. Yeah.
- 2 Q. Does he still live in Battle Creek?
- 3 A. To my knowledge, yes.
- 4 Q. And what was his title?
- 5 A. Truck driver.
- 6 Q. Do you know how to spell Bailey, B-A-I-L-E-Y?
- 7 A. Yes.
- 8 Q. Do you recall any names of the employees out at the
- 9 Albion-Sheridan Township Landfill --
- 10 A. No.
- 11 Q. -- other than Gordon Stevick, the owner?
- 12 A. No, I don't. One gentleman there I don't know if he's
- 13 still around out there or not. I don't know what his
- 14 name was. He lived on property there, but I don't
- 15 know.
- 16 Q. He lived on the property?
- 17 A. Yes.
- 18 Q. Do you recall any names of employees of your
- 19 competitors of Blyveis, I mean that may have used the
- 20 landfill?
- 21 A. No.
- 22 Q. Again, during your interview with Paul Rogers of EPA's
- 23 office, you mention that McGraw dealt directly with
- 24 Gordon Stevick with respect to -- was that for payment
- 25 of disposing the drums out at the landfill?

1 A. Yes.

2 Q. And, first of all, why did they deal directly with  
3 Stevick and not with you?

4 A. I don't remember the circumstances, I don't know why.

5 MR. BARBIERI: Don't guess if you don't know.

6 THE WITNESS: I don't know.

7 Q. (BY MR. LINDLAND) Okay, do you know exactly what  
8 happened, I mean how would they arrange for the payment  
9 of disposal?

10 A. I don't know.

11 Q. Were you paid by McGraw Edison to pick up the drums?

12 A. No.

13 Q. Why would you pick up the drums at McGraw Edison?

14 A. When they'd start having scrap cardboard and whatever  
15 came about, it was sort of a, per se, reciprocal deal  
16 where I would pick up the cardboard, remove it; and  
17 there was some value to this cardboard. And then  
18 compensation for taking the barrels out offset the time  
19 or whatever it was to take the barrels out. We were  
20 not paying for the scrap cardboard, so there wasn't any  
21 transaction there.

22 Q. Okay. So it was, in effect, a trade: the cardboard for  
23 your services?

24 A. Yes.

25 Q. To take the drums out?

1 A. Yes.

2 Q. And for the actual disposal cost associated with  
3 disposing of the drums at the landfill, McGraw dealt  
4 with Gordon Stevick directly; is that right?

5 A. Yes.

6 Q. Okay. Is there any other company that you had this  
7 sort of an arrangement with?

8 A. No.

9 Q. I may have asked you this question already: when you  
10 were working or when White Hull was in operation, did  
11 they ever take any drums or any material from  
12 Hayes-Albion to the Albion-Sheridan Landfill?

13 A. No.

14 MR. LINDLAND: Okay, I have no further questions.

15 (Deposition concluded around 3:15 p.m.)  
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